

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

In re:)
) Chapter 11
)
SPECIALTY RETAIL SHOPS HOLDING CORP., <i>et al.</i> ¹) Case No. 19-80064-TLS
)
Debtors.) (Jointly Administered)
)

**DEBTORS' RESPONSE TO AMENDED REQUEST FOR PAYMENT OF
ADMINISTRATIVE EXPENSE CLAIM OF BRIAN BASS OF FRIEDMAN
BROKERAGE COMPANY—WI, LLC AS RECEIVER**

Specialty Retail Shops Holding Corp. and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), hereby file this response (the “Response”) to the *Amended Request for Payment of Administrative Expense Claim of Brian Bass of Friedman Brokerage Company—WI, LLC, as Receiver* [Docket No. 763] (“Amended Request”) and in support of thereof state as follows:

1. On March 28, 2019, the Brian Bass of Friedman Brokerage Company—WI, LLC, as Receive (“Landlord”) filed its *Request for Payment of Administrative Expense Claim* [Docket No. 763] (the “Administrative Claim”).
2. The Debtors stipulated with Landlord that its Administrative Claim should be allowed in the amount of \$29,863.31, and on October 25, 2019 filed their *Second Amended Notice*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Specialty Retail Shops Holding Corp. (0029); Pamida Stores Operating Co., LLC (6157); Pamida Transportation LLC (4219); Penn-Daniels, LLC (0040); Place’s Associates’ Expansion, LLC (7526); Retained R/E SPE, LLC (6679); Shopko Finance, LLC (1152); Shopko Gift Card Co., LLC (2161); Shopko Holding Company, LLC (0171); Shopko Institutional Care Services Co., LLC (7112); Shopko Optical Manufacturing, LLC (6346); Shopko Properties, LLC (0865); Shopko Stores Operating Co., LLC (6109); SVS Trucking, LLC (0592). The location of the Debtors’ service address is: 700 Pilgrim Way, Green Bay, Wisconsin, 54304. The cases have been procedurally consolidated and are being jointly administered under the case caption listed above.

by Debtors of Their Agreement with Certain Administrative Claims (the “Second Amended Notice”) so indicating. [Docket No. 2029].

3. On November 4, 2019, Landlord filed the Amended Request, seeking allowance of the Administrative Claim in the amount previously stipulated to by the parties. [Docket No. 2041]. In addition, Landlord indicates in the Amended Request that the Administrative Claim has been transferred to MLMT 2006-C1 Plover Road, LLC (“Assignee”) and requests that payment be made to Assignee.

4. The Debtors do not object to the amount of the Administrative Claim stated in the Amended Request or to the assignment of the Administrative Claim to the Assignee, so long as the Administrative Claim is otherwise to be paid in accordance with the *Third Amended Joint Chapter 11 Plan of Specialty Retail Shops Holding Corp. and Its Debtor Affiliates* [Docket No. 1495] (the “Plan”) and the order confirming the Plan [Docket No. 1557].

[Remainder of page intentionally left blank.]

WHEREFORE, the Debtors respectfully request that the Court enter the Order granting the relief requested herein and such other relief as the Court may deem appropriate under the circumstances.

Dated: November 25, 2019

/s Michael T. Eversden

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